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JUL 28 2022	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

LATONIA SMITH,

Defendant.

3:22-cr-00051-MMD-CSD

CRIMINAL INDICTMENT

VIOLATIONS:

18 U.S.C. §§ 2261A(2)(B), 2261(b)(5) –
Cyberstalking

THE GRAND JURY CHARGES THAT:

COUNT ONE

Cyberstalking

(18 U.S.C. §§ 2261A(2)(B), 2261(b)(5))

Beginning on or about June 8, 2022, and continuing up to and including on or about
June 30, 2022, in the State and Federal District of Nevada,

LATONIA SMITH,

defendant herein, with the intent to harass and intimidate Victim G.N., used an interactive
computer service, electronic communication service, electronic communication system of
interstate commerce, and other facilities of interstate and foreign commerce to engage in
a course of conduct, described below, that caused, attempted to cause, and would

1 reasonably be expected to cause substantial emotional distress to Victim G.N., in violation
2 of Title 18, United States Code, Section 2261A(2)(B) and 2261(b)(5).

3 COUNT TWO
4 Cyberstalking
(18 U.S.C. §§ 2261A(2)(B), 2261(b)(5))

5 Beginning on or about June 8, 2022, and continuing up to and including on or about
6 June 30, 2022, in the State and Federal District of Nevada,

7 LATONIA SMITH,
8 defendant herein, with the intent to harass and intimidate Victim N.B., used an interactive
9 computer service, electronic communication service, electronic communication system of
10 interstate commerce, and other facilities of interstate and foreign commerce to engage in
11 a course of conduct, described below, that caused, attempted to cause, and would
12 reasonably be expected to cause substantial emotional distress to Victim N.B., in violation
13 of Title 18, United States Code, Section 2261A(2)(B) and 2261(b)(5).

14 COUNT THREE
15 Cyberstalking
(18 U.S.C. §§ 2261A(2)(B), 2261(b)(5))

16 Beginning on or about June 8, 2022, and continuing up to and including on or about
17 June 30, 2022, in the State and Federal District of Nevada,

18 LATONIA SMITH,
19 defendant herein, with the intent to harass and intimidate Victim R.B., used an interactive
20 computer service, electronic communication service, electronic communication system of
21 interstate commerce, and other facilities of interstate and foreign commerce to engage in
22 a course of conduct, described below, that caused, attempted to cause, and would
23 reasonably be expected to cause substantial emotional distress to Victim R.B., in violation
24 of Title 18, United States Code, Section 2261A(2)(B) and 2261(b)(5).

COUNT FOUR

Cyberstalking

(18 U.S.C. §§ 2261A(2)(B), 2261(b)(5))

Beginning on or about June 8, 2022, and continuing up to and including on or about June 30, 2022, in the State and Federal District of Nevada,

LATONIA SMITH,

defendant herein, with the intent to harass and intimidate Victim J.D., used an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and other facilities of interstate and foreign commerce to engage in a course of conduct, described below, that caused, attempted to cause, and would reasonably be expected to cause substantial emotional distress to Victim J.D., in violation of Title 18, United States Code, Section 2261A(2)(B) and 2261(b)(5).

COUNT FIVE

Cyberstalking

(18 U.S.C. §§ 2261A(2)(B), 2261(b)(5))

Beginning on or about June 8, 2022, and continuing up to and including on or about June 30, 2022, in the State and Federal District of Nevada,

LATONIA SMITH,

defendant herein, with the intent to harass and intimidate Victim S.M., used an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and other facilities of interstate and foreign commerce to engage in a course of conduct, described below, that caused, attempted to cause, and would reasonably be expected to cause substantial emotional distress to Victim S.M., in violation of Title 18, United States Code, Section 2261A(2)(B) and 2261(b)(5).

Course of Conduct

Defendant Smith's course of conduct included the following:

- 1 1. On April 29, 2021, Smith was convicted in the District of Nevada on five counts
2 of Mailing Threatening Communications in violation of 18 U.S.C. § 876(c), in
3 case no. 2:19-cr-00304-001. The evidence at trial proved that the defendant Smith
4 threatened employees of Caesars Entertainment and attorneys representing
5 Caesars Entertainment. She was released from prison for that conviction on June
6 3, 2022, under the supervision of the U.S. Probation Office for a term of three
7 years of supervised release. The Victims R.B., S.M., J.D., and G.N. were or are
8 assigned in their official capacities to case no. 2:19-cr-00304-001. Victim N.B. is
9 the spouse of R.B.
- 10 2. Defendant Smith also has pending charges by the State of Nevada in a related
11 case for assault with a deadly weapon and burglary involving a deadly weapon. It
12 is alleged that on October 31, 2019, Smith entered the residence of one of the
13 attorneys representing Caesars Entertainment, where the defendant Smith
14 physically assaulted the attorney with what is believed to be a replica Glock .45
15 BB-gun.
- 16 3. On or about June 8, 2022, defendant Smith emailed Victim N.B., “had to go to
17 jail because of decisions your husband made during my trial and the corrupt
18 justice system for minorities which obviously ruined my entire life/everything
19 I’ve worked for and which I am obviously very bitter about. . . .”
- 20 4. On or about June 23, 2022, defendant Smith emailed Victim S.M., “You get
21 what you f* deserve,” followed by an email that stated, “You people in this state
22 will all suffer when the day comes--society, judges, police, attorneys. The whole
23 system. People will know why their families were taken and broken into little
24 pieces. Mercy to those that escape that fate.”

- 1 5. On or about June 23, 2022, defendant Smith emailed Victim S.M., “Some good
2 advice: Life is short, society should be careful who they piss off.” Defendant
3 Smith included in the email a YouTube link to a compilation of cell phone videos
4 of the October 1 mass shooting in Las Vegas, NV.
- 5 6. On or about June 25, 2022, defendant Smith emailed the courtroom
6 administrator for Victim G.N., “I just wanted to give a friendly notice for you
7 and your colleagues: YOU ALL FUCKED UP AND MADE THE WRONG
8 CHESS MOVE.” Defendant Smith then listed G.N. and several of G.N.’s
9 colleagues by name. Defendant Smith concluded the email by stating, “LET
10 THE SHOW BEGIN. NEVADA IS GOING TO LOVE THIS!!!!”
- 11 7. On or about June 25, 2022, defendant Smith emailed the courtroom
12 administrator for Victim R.B., “I don’t know why [R.B.] transferred me to [J.D.].
13 However, tell him I said hello! I got to talk to his wife-[N.B.]. Nice kids-[O.B.,
14 Z.B., K.B.] I let his wife know I hope we can have an honest conversation one
15 day about his decisions and injustices.” In the email, defendant Smith listed
16 Victims R.B.’s and N.B.’s children by their first names.
- 17 8. On or about June 25, 2022, defendant Smith sent N.B. an email again listing
18 N.B. and R.B.’s childrens’ first and last names, as well as references to their
19 activities and interests, followed by the statement, “LET’S KEEP THEM IN
20 FOCUS.” Defendant Smith stated in the email, “I saw that his mother [redacted]
21 passed. Good Dad. His brother is pretty successful too (software engineering is
22 it?!..nice).” Defendant Smith further stated, “I think [R.B.] would remember that
23 he let prosecutors use my email to a mental health provider at trial knowing it
24 would aid them in conviction, which is against the law by the way. But who cares

1 about laws anymore right?! Judges are above the law!!!! He also appointed me a
 2 federal public defender knowing she was ineffective. Failed to file a suppression
 3 motion after police raided my home without warrants. But I believe she was
 4 instructed not to by your corrupt husband.” Defendant Smith further stated,
 5 “Well what they don’t know is that they ruined the WRONG life and this won’t
 6 age very well for Nevada. So [N.B.], you seem like an intelligent woman. PhD-
 7 Yale. How do we address this? I don’t think [R.B.] would want such an injustice
 8 as this (or any injustice) to happen to his kids now would he? Beautiful family.
 9 Again tell [R.B.] I said hello!!!!”

10 9. On or about June 25, 2022, defendant Smith emailed the courtroom
 11 administrator for Victim J.D., “I don’t know why [R.B.] transferred me to [J.D.]
 12 because [R.B.] and I have a lot of history and we still have quite a bit to discuss
 13 concerning injustices and his decision making. Anyway Please tell [J.D.] to put
 14 her picture on the website like [R.B.]. Thank you.”

15 10. On or about June 26, 2022, defendant Smith emailed the courtroom
 16 administrator for Victim J.D., “Tell [J.D.], Henderson is nice I see why she chose
 17 that area. Lots of shops nearby. Smart. I have nothing against her as of now. It’s
 18 the rest of her corrupt colleagues that I told [redacted] about (that’s [G.N.’s]
 19 assistant; I know they all talk because they’ve all been illegally conspiring on this
 20 case from the very beginning with the exception of [R.B.]..he’s newly added)”
 21 Defendant Smith then listed Victims G.N. and R.B. by name, along with several
 22 of their colleagues. Defendant Smith then listed J.D.’s husband by name along
 23 with other background information on J.D. Defendant Smith then stated, “I hate
 24 judges but so far [J.D.] is pretty nice . . . However she is nice right now and I

1 hope she never has to end up on the other side with the rest of them because well
2 they're not in a good place and it's not them that will pay for their corrupt actions
3 so to speak, but society and they'll have to watch."

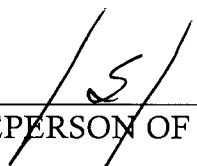
4 11. On or about June 26, 2022, defendant Smith emailed S.M., "I have not broken
5 any laws and nothing in my supervision provisions says I can't email." . . . "Plus
6 if I was going to do anything, none of you would be able to do anything because
7 you wouldn't know anything before it's too late and I'd kill myself so."

8 12. On or about June 26, 2022, defendant Smith sent an email to G.N.'s courtroom
9 deputy stating, "And when the day comes and the mission has been completed
10 [G.N.] I'll be dying that day."

11 13. On or about June 30, 2022, defendant Smith emailed Victim S.M., "I believe the
12 guys told me that I couldn't email public officials but I wanted to tell [J.D] it's
13 such a small world I know her daughter [K.P.] . . . Just interesting small world. . .
14 I've realized something Broken systems [S.M.] broken systems [S.M.] is why
15 Americans die."

16 **DATED:** this 28TH day of July, 2022.

17 **A TRUE BILL:**

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19 _____
FOREPERSON OF THE GRAND JURY

20 JASON M. FRIERSON
United States Attorney

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22 ANDOLYN JOHNSON
23 Assistant United States Attorney
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